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Date: June 1, 2004

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Comr	ments	

NATURAL RESOURCES COMMISSION
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AYMOND POUPORE



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

State Office Building 350 Ottawa, N.W. Grand Rapids, Michigan 49503

May 31, 1990

Mr. Bruce Tiejema Sealed Power Technologies, L.P. 2001 Sanford Street Muskegon Heights, MI 49443

RE: MID980499735

Dear Mr. Tiejema:

On May 30, 1990, staff of the Department of Natural Resources conducted an investigation of your facility located at 2001 Sanford Street, Muskegon Heights, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended, and with Michigan Act 64, P.A. 1979. The completed inspection form is enclosed.

As a result of that investigation, staff of the Department of Natural Resources have determined that the above facility is in compliance with the requirements of Subtitle C of RCRA and Act 64 which were addressed by the enclosed inspection forms.

The enclosed forms are to be used by the company to prepare a new financial test document for 1990. The company has used the financial test to demonstrate financial capability for closure costs and liability coverage as required by Act 64 and RCRA. Such financial assurance is required until closure is completed and the company is formally released from this requirement. Please have the appropriate personnel complete the forms and return them to our office as soon as possible.

If you have any questions regarding this matter please feel free to contact me.

Sincerely,

Dale M. DeKraker

Environmental Quality Analyst Waste Management Division

Rekukin

616-456-5071

DMD/bls Enclosure

R 1026-1 5/88

RCRA LAND DISPOSAL RESTRICTION INSPEL ON

Facility:	Seale	ED Pawo	~ TECHNOLOW	es L.P.	-
U.S. EPA I.D. No. :		98049			
Street:		OI SANFO	no	25.7	
City:			State:	zip: <u>4</u>	9443
Telephone:	616-	724-53	5/7		
Owner/Operator:				5	
Street:	Sea	ter Par	er Teurnouce	ITES C.F).
City:	30255	ANFORD	State: Mi	Zip:	19443
Telephone:	616	-724-557	7		
Inspection Date:	5/30 F	70 Time:	9'w - H:08		
Weather Conditions:	CLEAR, 6	mrlo			
	Nama		Namar (Ti+1e	TT.	al ophone
	Name	i)/_1	Agency/Title	-	elephone
Inspectors:	Name Dale De	Kehn	Agency/Title	-	
Inspectors: Facility Representative:	DALE DE			6	16-456-507
Facility	DALE DE		MONR	6	16-456-507
Facility	DALE DE		MONR SI PLANT ENGI	6	16-456-507
Facility	HAROLD L	-ARABec	MONR SI PLANT ENGI	\www.	616-456-507
Facility Representative:	HAROLD L	-ARABec	MONR SI PLANT ENGI	\www.	616-456-507
Facility Representative: F-Solvent	HAROLD L	-ARABec	MONR SI PLANT ENGI	\www.	616-456-507
Facility Representative: F-Solvent Dioxin	HAROLD L	-ARABec	MONR SI PLANT ENGI	\www.	616-456-507

INSPECITION SUMMARY

Processes That Generate LDR Wastes

FOOL WASTE (THCHORDETHYLEND) IS GENDROSHED From DECISIMPHILE DEG PRESINCE OFFRATIONS. FOOL STILL BOTTOMS From RECISIMPHILE OF FOOL SOCIEDED IS ALSO GENERATED. STILL BOTTOM GENERATED PORTS IS a LIGHT METER IS IN 2 chromal /ME.

Some FOOD (Methylous Chromas) waste is also controld From STRIPPING OPERATIONS.

LUR Waste Management

ALL WASTES ARE EITHER SENT FOR RECLAIM ON INCINEVATION. Drums ARE HELD IN ACCUMULATION MEAT FOR & 90 DAYS.

Summary

No vicintals were observed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASIE IDENTIFICATION

	Does	the facility handle the following wastes?
	a.	F001 through F005 spent solvents
		Yes V No _ List* Fool Fool
	b.	Dioxin-containing Wastes
		Yes No List*
	c.	California List Wastes
		Yes No List*
	đ.	First and Second Third Wastes
		Yes No List*
		* List wastes if room allows or attach Appendix A.
		Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities)
2.	Does	the facility handle the following wastes (national capacity variances)?
	a.	F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — $11/08/90$).
		Yes No _ Comments
	b.	Dioxin contaminated soil and debris resulting from a CERCIA response action or a RCRA corrective action (effective date — 11/08/90).
		Yes No Comments
	c.	California list contaminated soil or debris resulting from a CERCIA response action or a RCRA corrective action (effective date — 11/08/90).
		Yes No Comments

~.	K051, K052, or K071 (effective date - 08/08/90).
	Yes No Comments
e.	First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date — 08/08/90). Yes No Comments
	Yes No _V Comments
f.	Second Third contaminated soil and debris which have a treatment standard based on incineration — F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date — 06/08/91).
	Yes No (/ Comments

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A.

Tre	atability Group - Treatment Standards Identification
1.	F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?
	Yes No NA
	If yes, check the appropriate treatability group.
	Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight) All other spent solvent wastes
2.	First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?
	Yes No NA
	If yes, list the waste code and check the correct treatability group.
	Waste Code Wastewater* Non-wastewater
	
	
	<u> </u>
	* Less than 1% TOC by weight and less than 1% filterable solids.
3.	California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?
	a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?
	Yes No NA
	If yes, specify the method:
	5 Revised 10-20-89

		b.	For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?
			Yes No NA/
			If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:
		с.	For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart 0 or 40 CFR Part 265 Subpart 0?
			Yes No NA \(\)
	4.	stan	the generator mix restricted wastes with different treatment dards? No Comments
ks.			
Ē.			res, did the generator select the most stringent treatment standards .41(b), 268.43(b))?
		Yes	No Comments
в.	Wast	e Ana	lysis
	1.		the generator determine whether the restricted waste exceeds then standards or prohibition levels at the point of generation by:
		_	Knowledge of waste Yes No
			List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination. FOOL FOOR - KNOWLEDGE THAT WASTE WASTE TULP - PURE SOLVENTS
			- Cours product from the second of the secon

		was all supporting data recalled off-site, [200.7(a)(5)]?
		Yes _ No _ (mso streets)
	-	TCLP Yes No NA
		List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.
	_	Total constituent analysis Yes No NA
		List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.
	_	pH ≤ 2 Yes No NA ∠
		List the wastes for which pH testing was used.
	-	Paint Filter Liquid Test Yes No NA
2.		s the facility dilute the restricted waste as a substitute for adequate atment [268.3]?
	Yes	No NA
c.	Mana	agement.
	ı.	On-Site Management
		Is restricted waste treated, stored for greater than 90 days, or disposed on-site?
		Yes No _/ Comments
-		If yes, the TSD Checklist must be completed.

ULL	Sico rangulario							
a.	Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?							
	Yes No (If no, go to b)							
	If yes, identify waste code and off-site treatment or storage facilities:							
	Waste Code Facilities Treat/Store							
	FOOL-FOOL PERREZ Corp. RECLAIM							
•••	Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?							
	YesNo							
-	Does notification contain the following?							
	EPA Hazardous waste number(s) Yes No							
•	Applicable treatment standards Yes Vo No and prohibition levels							
	Manifest number Yes No							
	Waste analysis data, if available Yes No							
b.	Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?							
	Yes No (If no, go to c)							
	If yes, identify waste code and off-site disposal facilities:							
	Waste Code Facility							
	,							
	· · · · · · · · · · · · · · · · · · ·							

-	Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?					
	Yes No				_	
usina.	Does notification contain the foll	owing?			•	
	EPA Hazardous waste number(s)	Yes	No _			
	Applicable treatment standards and prohibition levels	Yes	No _	_		
	Manifest number	Yes	No _			
	Waste analysis data, if available	Yes	No _			
	Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)]	Yes	No	<u></u>		
c.	Is the waste subject to a nationwi extension (268.5), or no migration		•	_	€	
	Yes No / (If	no, go to	đ)			
_	If yes, does the generator provide receiving facility that the waste disposal [268.7(a)(3)]?					
	Yes No					
***	Does the notification contain the	following	infor	mation?		
	EPA hazardous waste number	Yes		No		
•	The corresponding treatment standard and all applicable prohibitions			No		
	Manifest number	Yes		No		
	Waste analysis data, if available	Yes		<i>N</i> o		
	Date the waste is subject to the prohibitions	Yes		No		
đ.	Does the facility generate any Fir waste?	st or Sec	ond Th	ird "soft	hammer"	
	Yes No V (If no, g	to to 4)				

	-		the generator ring facility							
		(i)	EPA hazardo	ous waste	number	7	Yes	No		
		(ii)	Applicable [268.33(f)			. 3	Yes	No		- .
	((iii)	Manifest n	mber		3	Yes	No		
		(iv)	Waste analy if availab		ι,	3	Yes	No		
3.	"Sof	t Hamme	er" Demonstra	ations/Ce	ertificat	ions				
•	a.		ny "soft ham ate disposal						ned for	• •
		Yes _	_ No´							
	b.	recove	ne generator ery facilitie onmental bene	es that p	rovide t	reatmen				
	-	Yes _	_ No							
	C.	Region	ne generator nal Administ nble treatmen	rator to	document	its e				
		Yes _	_ No							
	_		s, did the go fication pric				mentatio	on and		
		Yes	_ No		,			_		
	đ.	Does t	he demonstra	ation con	tain the	follo	wing info	ormation	1?	
			of faciliticals contacted		acility	3	Yes	No		
		Addres	sses				Yes	No		
		Telept	one numbers			3	Yes	<i>N</i> o	-	
		Contac	t dates			7	Yes	No		
		Certif	fication star	tement :		7	Yes	No	-	
				<u>.</u>	0	Re	evised l	0-20-89	•	

	Attach a copy of the demonstration and certification.
e.	If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste $[268.8(a)(2)(i)]$?
	Yes No NA
	If yes, attach a copy of written discussion.
f.	Does the generator ship its "soft hammer" waste off-site for treatment?
	Yes No
	Describe the type of treatment and treatment facilities:
	Waste Code Type of Treatment Treatment Facility
	· · · · · · · · · · · · · · · · · · ·
	<u> </u>
g.	Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?
	Yes No
h.	Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?
	Yes No NA
Reco	rds Retention
Does demoi	the facility retain on-site copies of all notifications, nstrations, and certifications for a period of 5 years [268.7(a)(6)]?
Yes .	V No Comments

D.	RCRA	Corrective Action and CERCIA Response Action Waste
	1.	Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCIA response action in a landfill or surface impoundment?
		Yes No Comments
	2.	Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?
		Yes No NA _V Comments
E.	Trea	tment Using RCRA 264/265 Exempt Units or Processes
	1.	Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?
•		Yes No
		List types of waste treatment units and processes:
		Waste CodeType of TreatmentTreatment Units and ProcessesFOOIRECURIONDISTILLATION CONTDOO?DEATH CONTO
	2.	Are treatment residuals generated from these units?
		Yes No _ Comments _ FOOL STILL BOTTOMS
		If yes, the residues are subject to the LDR generator requirements.
	3.	Are these residuals further treated, stored for greater than 90 days, or disposed on-site?
		Yes No NA Comments
		If yes, the TSD checklist must be completed.

C BR



NATURAL RESOURCES COMMISSION
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JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

State Office Building 350 Ottawa, N. W. Grand Rapids, MI 49503 Phone: 616-456-5071 July 14, 1986

Mr. Danial T. Girvan Sealed Power Corporation 100 Terrace Plaza Muskegon, MI 49443

RE: MID 980499735

Dear Mr. Girvan:

This correspondence is written to acknowledge receipt of your letter dated July 11, 1986, which itemizes actions taken by the company to correct deficiencies noted during the RCRA inspection on March 14, 1986. Our inspection on July 11, 1986, has confirmed correction of the violations.

Therefore, this is to notify you that at this time the company has corrected the violation(s) identifed in the compliance letter of March 17, 1986, with regard to the Resource Conservation and Recovery Act.

Sincerely,

Does Dethober

Dale M. DeKraker Environmental Quality Analyst Hazardous Waste Division

DMD/mn

cc: M. Murphy, U.S. EPA Region V (w/enc.)

R1026-1 1/86 Seared Power Corporation 100 Terrace Plaza P.O. Box 299, Muskegon, MI 49443 Telephone 616-724-5011, Telex 228464

SEALED POWER

July 11, 1986

HAZARDOUS WASTE DIVISION

JUL 1 4 1986

GRANT RAPINS

Dale DeKraker Hazardous Waste Division Department of Natural Resources State Office Building 350 Ottowa N.W. Grand Rapids, MI 49503

MID 980499735

Dear Mr KeKraker:

un June 24, 1986, the drums of solvent which had been stored more than 90 days were shipped to a hazardous waste fuel blender for disposal. At this time, all hazardous wastes in storage at our Sanford Street facility are within the 90 day RCRA limit.

Sincerely

Daniel Girvan

Environmental & Energy Manager

DG:jc

XG; EPA REGION P



NATURAL RESOURCES COMMISSION
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JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

State Office Building 350 Ottawa, N. W. Grand Rapids, MI 49503 Phone: 456-5071 March 17, 1986

Mr. Danial T. Girvan Sealed Power Corporation 100 Terrace Plaza Muskegon, MI 49443

RE: MID 980499735 (Sanford Street Plant)

Dear Mr. Girvan:

On March 14, 1986, staff of the Department of Natural Resources conducted an investigation as an agent of U.S. EPA of your facility located at 2001 Sanford Street, Muskegon, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. A copy of the completed RCRA inspection form is enclosed.

As a result of the investigation, staff of the Department of Natural Resources determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that the following requirements were not being met:

- 1) The company has not been analyzing its hazardous waste solvents in accordance with its waste analysis plan. This requirement is outlined in 40 CFR, Part 265.13 of RCRA.
- 2) The company's closure plan does not include a time estimate for each step in the closure procedure nor is there evidence that the cost estimate of closure has been adjusted annually for inflation as required by 40 CFR, Part 265.112 of RCRA.
- 3) A number of containers of the company's own generated hazardous wastes have been stored well in excess of the 90 day time limit established by statute, primarily the result of a recent waste load rejection by the disposal facility. Since your existing Part A does not authorize such activity, Sealed Power is obligated to file an amended Part A as well as to apply for an Act 64 storage facility operating license, should this activity continue.

Sealed Power Corporation RE: MID 980499735 (Sanford Street Plant) March 17, 1986

We request that you respond to this letter by April 4, 1986, providing documentation to this office regarding those actions being taken to correct the above stated violations and correction of same violations prior to May 1, 1986. The DNR will evaluate your response and forward a copy of the response to the U.S. EPA along with a recommendation on your facility's compliance status.

If you have any questions, feel free to contact me and address your response to the address on this letter.

Sincerely,

Dale M. DeKraker

Environmental Quality Analyst

Den m. Dethokur

Hazardous Waste Division

DMD/mn

cc: M. Murphy, U.S. EPA, Region V (w/enc.)

Enclosure

S PR

NATURAL RESOURCES COMMISSION
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JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

State Office Building 350 Ottawa, N. W. Grand Rapids, MI 49503 Phone: 616-456-5071 May 12, 1986

Mr. Daniel T. Girvan Sealed Power Corporation 100 Terrace Plaza Muskegon, MI 49443

CERTIFIED MAIL

RE: SECOND LETTER OF WARNING

MID 980499735

Dear Mr. Girvan:

On March 14, 1986, staff of the Department of Natural Resources conducted an inspection on behalf of the United States Environmental Protection Agency at your facility located at 2001 Sanford Street, Muskegon, Michigan.

The inspection revealed that your facility was in violation of the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. As a result, this office sent your facility a deficiency letter dated March 17, 1986, (copy attached) specifying the observed violations. The response date in the letter, by which time the company was to have corrected all violations, was May 1, 1986.

In a response letter dated April 11, 1986, Sealed Power outlined steps to be taken to correct the observed violations. To date, we have no written confirmation that violations noted during the inspection have been corrected. A copy of the analysis on the still bottom waste was to have been sent upon completion but we have not received that information.

Further, a copy of the revised closure plan was to have been sent but was not received. Finally, some containers of hazardous waste which were found to be stored for greater than 90 days apparently are still on-site, although a recent telephone conversation indicated that many of these containers have now been sent off-site for disposal. Nvertheless, those containers remaining on-site are still in violation of the 90 day limit rule.

Page 2
Sealed Power Corporation
SECOND LETTER OF WARNING - MID 980499735
May 12, 1986

Therefore, this letter is to inform you that if the violations are not completely addressed by June 10, 1986, this matter will be referred to the U.S. EPA for enforcement actions and for penalty assessment pursuant to Section 3008(c) and (g) of RCRA. For each day of continued non-compliance, your company may be subject to a civil penalty of up to \$25,000,00.

If you have any questions, please contact this office.

Sincerely,

Ronald C. Waybrant, Ph. D.

District Supervisor

Hazardous Waste Division

RCW/mn

cc: M. Murphy, U.S. EPA, Region V

J. Bohunsky/C&E file, HWD

Attachment

RCRA Inspection Report

EPA	Identification Number: M I D	98049	9735
Inst	callation Name: SEALED Pou	DER CORFORATION	
Loca	ation Address: 2001 Sa	ANFORD STERET	normalismostania, an
City	Y: MUSKEGON	State: MICHIGAN	/
Date	e of inspection: 3-14-86	Time of inspection (from)	9:30AM (to) 12:15PM
Per	son(s) interviewed	Title	Tel ephone
Dan	VIAL T. GIRVAN	ENVIRONMENTAL AND ENERGY MANAGER	616-724-5011
	pector(s) ALE DE KRAKER	Agency/Title MICHIGN DNR	Telephone 6/6- 4/56-5071
<u>I ns</u>	tallation Activity (mark only one	box) ,	Inspection Form(s)
X	Treatment/Storage/Disposal per 40 Generation and/or Transportation	CFR 265.1 and/or	A
II	Treatment/Storage/Disposal (no ge	neration or Transportation)	A
II	Generation and Transportation		B, C
II	Generation only		В
П	Transportation only		С

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

- 1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- 2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit appli	catio	n process(es) (EPA Form 3510-3)	Inspection Form	A section(s)
501	II	storage in containers		I
\$02	X	storage in tanks		(<u>j</u>)
T01		treatment in tanks		J
\$04	\prod	storage in surface impoundment		K,F
T02	Ш	treatment in surface impoundment		K,F
D83	П	disposal in surface impoundment		K,F
\$03		storage in waste pile		L
D81		disposal by land application.		M,F
D80		disposal in landfill	•	N,F
. T03	\prod	treatment by incineration		0/P
Т04		treatment in devices other than t impoundments, or incinerators	anks, surface	Q
Other activities	_			
GENERATOR	M		APPENDIX	(GN)
TRANSPORTER	X		APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

NONE

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

NONE

		_	Section B:	GENERAL	FACILITY	STAN	DARDS:	(Part	265 Subpart B)
						YES	МО	NI*	Remarks
1.	Has beer	the Region	nal Administ regarding:	rator 265.12					
	a.	Receipt o waste fro	f hazardous m a foreign	source?				<u> </u>	NO FOREIGN WASTES
	ь.	Facility	expansion?						NO EXPANSIONS
	C+	Change of	owner or o	perator?		************************	*	V	NO CHANGES
2.	Gene	eral Waste	Analysis:	265.13	•				
	a.	a detaile	wner or ope d chemical of the wast	and physi		·	V	· · · · · · · · · · · · · · · · · · ·	ANALISIS HAVE NOT BEEN
	b.	a detaile	owner or oped waste and the facil	lysis pla		<u>/</u>	Westerda in comme	· · · · · · · · · · · · · · · · · · ·	A GAS ONLINE D
	с.	specify pand analy	waste analy rocedures f rsis of each waste from	or inspec movement	of		· · ·		~ -
3.	Sec	urity - Do (if ap	security moplicable) 2	easures i 165.14	nclude:			•	
	a.		urveillance	?	-				SECURITY SERVICE
	b.		cial or nat er around fa		***	~	-		EENCE
			olled entry?		-	1	*********		
	C.	Danger si entrance?			•	<u>l</u>		**************************************	
4.	0wn	e <mark>r o</mark> r oper	ator inspec	tions: 20	55.15				
	a.	<pre>inspect t malfuncti operator of hazard</pre>	owner or op the facility ions, deteri errors, and lous waste t t human hea ronment?	for oration, dischance hat	ges	<u> </u>	······································		

			153	NO	14.1	Remarks
	have	the owner or operator an inspection schedule e facility?	V	**************************************		
		, does the schedule address nspection of the following :				
	i• ៣	onitoring equipment?	V			TANK LEVEL
	ii. s	afety and emergency equipment?		· · · · · · ·		
	iii. s	ecurity devices?	V			GUARD SERVIKE
	iv. o	perating and structural equip- ent (i.e. dikes, pumps, etc.)?				
	f Te	ype of problems to be looked or during the inspection (e.g. eaky fitting, defective pump, tc.)?	<u>L</u>	THE BANKS OF THE STREET	The state of the s	
	ti	nspection frequency (based upon he possible deterioration rate f the equipment)?	3			DAILY WEEKLY
	d. Are a ed da	reas subject to spills inspect- '		101chis 10cs	•	
	an ins	the owner or operator maintain spection log or summary of or operator inspections?				KEPT BY STILL
	f. Does t follow	the inspection log contain the ving information:				o Permit.
	i. ti	ne date and time of the inspection?	<u> </u>	~~~		Manufacture and Subject on the Subject of Subject on Su
	ii. th	ne name of the inspector?	1		-	
		notation of the observations ade?	L			
		ne date and nature of any epairs or remedial actions?	<u> </u>			emelon and development and the second and the secon
5.	Do personnel tra include: 265.					
	a. Job ti	tles?	1			
	b. Job de	escriptions?	-		DOMORAN TO A	

			152 110	14.7	Remarks
	С.	Description of training?		AMERICAN AND AND AND AND AND AND AND AND AND A	MSU INDUSTRIAL COMPLE
	d.	Records of training?		**************************************	44
	е.	Did facility personnel receive the required training by 5-19-81?		· Comment	
	f.	Do new personnel receive required training within six months?	<u> </u>	M ^(S) Per-kalvosidak	
	g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?	V	Walled Open Dictiff	FEGRUARY 1986
6.	rec	required, are the following special quirements for ignitable, reactive, incompatible wastes addressed? 265.	17		
	a.	Special handling?			WASTES ARE NOT IGNITABLE
	b.	No smoking signs?			OF REACTIVE.
	C.	Separation and protection from ignition sources?	This Philips - 499 (Shedhania)		-

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

•	of	ntenance and Operation Facility: 265.31 Is there any evidence of fire, explosion, or release of hazardous waste or hazardous	YES	NO	NI	Remarks
		waste constituent?	<u></u>			
2.	If hav	required, does the facility e the following equipment: 265.32				
	a.	Internal communications or alarm systems?	<u></u>		Markette and the	FIRE ALGEMS SPRINKER SYSTEM
	b.	Telephone or 2-way radios at the scene of operations?	<u></u>			TELEPHONES
	C.	Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	Barren and Carlo			ALL EQUIPMENT
	Ind	licate the volume of water and/or foam	n avai	lable	for fi	re control:
		CITY AND WELLS -	SUP	PLY	40AQUA	π€
				ę		
3.		sting and Maintenance of ergency Equipment: 265.33		,		
3.	Eme	sting and Maintenance of	V	9		QUARTERLY
3.	Eme	sting and Maintenance of ergency Equipment: 265.33 Has the owner or operator established testing and maintenance procedures	<u></u>	9		
 4. 	Eme a. b.	sting and Maintenance of ergency Equipment: 265.33 Has the owner or operator established testing and maintenance procedures for emergency equipment? Is emergency equipment maintained in operable	<u> </u>	,		
	b. Has	sting and Maintenance of ergency Equipment: 265.33 Has the owner or operator established testing and maintenance procedures for emergency equipment? Is emergency equipment maintained in operable condition? s owner or operator provided mediate access to internal		,		QUARTERLY

Secti	on D: C	ONTINGENCY	PLAN	AND	EMERG	ENCY	PROCED	URES:	(Part 265 Subpart D)
					YES	МО	NI	Rema	rks
Does the Contir following infor	ngency Pl mation:	an contain 265.52	the						
a. The actions must take to \$265.51 and to fires, e unplanned rwaste? (If Prevention, measures (Sonly to ame incorporate management sufficient requirement applicable.	to comply 265.56 explosion release of the own Control PCC) Pland that e hazardo provision to comples of this	with in response in response is, or any of hazardous er has a Spand Count in, he needs plan to bus waste ons that are y with the	s oill ter-						
b. Arrangement police department hospitals, and local esto coordinate pursuant to	rtments, contract mergency te emerg	fire departors, and Standard response to pency services	ate teams	ts	V			4	
c. Names, addr numbers (of persons qua emergency c	fice and lified t	home) of a o act as	al 1		<u> </u>			_08	DATING EEQUIZED
d. A list of a at the faci location an of each ite brief outli	lity whi d physic m on the	ch includes al descript list and a	the ion		<u>~</u>		***************************************		
e. An evacuati sonnel wher ity that ev sary? (This signal(s) t tion, evacu evacuation	e there acuation plan mu o be use ation ro	is a possible could be rest described to begin outes, and a	oil- neces- evacu	1a-	Lor				uever Nature of
Are copies of t available at th emergency organ	e site a	nd local			4			WA CA	USE EVACUATION

		YES	ИО	ΝI	Remarks
Eme	rgency Coordinator 265.55				
a.	Is the facility Emergency Coordinator identified?	<u> </u>		4,44	Mr Harolo LARABEE
b.	Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>~</u>			
c.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u> </u>	, 		
Eme	rgency Procedures 265.56				
at Coc	an emergency situation has occurred this facility, has the Emergency ordinator followed the emergency occurred in 265.56?		horizotten-	<u> </u>	NO EWERGENCY HAS

			S	ection E:	MANIFEST	SYSTEM, F	RECORDKEE	PING,	AND R	EPORTING:	(Part 265	Subpart E)
			_				YES	NO	NI	Remarks		
**	, .	Use	of M	lanifest Sy	stem 26	55.71						
		ā.	proc proc (Par the gene	the facil edures listessing each ticularly signed man rator with very.)	sted in §20 ch manifes sending a nifest back	65./1 for t? copy of k to the	V	-				
		b.		records of ined for 3		pments			-	* * * * * * * * * * * * * * * * * * *	· · · · · · · · · · · · · · · · · · ·	
*	2.	req	uiren	e owner or ments regaincies?	rding mani		V		QQQQQQQQ -			
. *	of o	on-s	ite f	le to owner acilities waste from	that do n	ot						
	3.	0pe	ratin	ng Record	265.73							
		a.	mair	the owne ntain an op ord as req .73?	perating	tor		/· ·	orbital trade and the	-		
		b.	cont	the oper tain the fo ormation:		rd						
			i.	storage,	aste's tre or disposa in 40 CFR	atment, il as	V		******	,		
			ii.	each haza facility? should be to specif	ion and qu rdous wast (This in cross-ref ic manifes was accomp fest.)	e within nformation erenced t number,	the 1		NOTATION AND ADDRESS OF THE PARTY OF THE PAR	ONL	<u> </u>	LO CATION
		***i	ii.		diagram of isposal ar							

^{***} only applies to disposal facilities

		· ·	YES	NO	NI	Remarks
		showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	-		<u>u</u>	
	ív.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?		<u>.</u>		WASTE ANALYSIS NOT
-	٧.	Reports detailing all incidents that required implementation of the Contingency Plan?	Mindrana, com		-4/	AUALIACCE
	vi.	All closure and post closure costs as applicable?	<u> </u>			
4.	Availa	bility of Records 265.74				
-		l facility records required 40 CFR Part 265 available for ction?	1	_		
5.*	*Unmani	fested Waste Reports 265.76				
	hā ge wi	es the facility accepted any exardous waste from an off-site enerator subject to 40 CFR 262.20 thout a manifest or or shipping aper?				
	of de ar	"a" is yes, provide the identity the source of the waste and a escription of the quantity, type, and date received for each unmaniested hazardous waste shipment.				

^{**} Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

	•			Section G ·	_OSURE AND PO	ST CL	<u>OSURE</u>	(Part :	Subpart G)
						YES	ИО	NI	Remarks
	Clo	sure	265	5.112					CLOSURE PLAN NOT
	a.	Is pla	the fonda	acility closur ilable for ins	re spection?	<u></u>	,		UPDATED ANNUMET.
	b.	Doe	s the	plan identify	/: ·				
		i.		mum extent und facility life?				<u>/</u>	100%
		ii.	maxi vent	mum hazardous ory?	waste in-	<u> </u>			3000 6440NS
		iv.	esti	mated year of	closure?				2005 A.D.
		٧.	sche	dule of closur	re activities?				REQUIRES TIME ESTIMATES
	C.	Has	clos	ure begun?			- Bonnes	***************************************	
2.	Pos	t-C1	osure	265.118					
	a.			ost-closure plection?	lan available		U	TTERMINA	
	b.	Does	s thi	s plan contair	*				•
		i.	moni	ription of gro toring activit uencies?			· P		
		ii.		ription of mai vities and fre					
			дА.	integrity of cover, or cor structures, v	ntainment		All of All Town Williams Associates		
			BB.	facility moni	itoring equip-				
	i	ii.	of p	, address, and erson or offic	d phone number se to contact re care period?				
	c.	Has	the	post-closure p	period begun?			OTRODI AMO Dá-	
	d.			ritten post-c available?	losure cost 265.144	movimentum		······································	

Applies only to disposal facilities.

Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

٦.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192				
		<u> </u>	FOOL	STILL BOTTOMS	
2.	Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?	<u> </u>	CONTA		
3.	Do continuous feed systems have a waste-feed cutoff?			1 ADDITION	
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?	265.193		TANK DEDIGIED TO	
5.	Are required daily and weekly inspections done? 265.194	V_		SAME WASTE	
6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 2 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	265.198		NA	
	Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)		beer	NA	
8.	Has the owner or operator observed t buffer zone requirements for tanks c	he National Fire	Protecti	on Associations active wastes?	
	Tank capacity:gallons				
	Tank diameter:feet		,		
	Distance of tank from property li	ne)[A	feet	
	(See table 2 - 1 through 2 - 6 of Code - 1977" to determine complia	NFPA's "Flammab	le and Cor	mbustible Liquids	

Şρ	cti	on	Α:	Scope
\sim		0,,		-3 T T F

 Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

		·				•
Sect	ion E	B: MANIFEST REQUIREMENTS (Part 262, Subpart	в)			
		• •	YES	NO	NI	Remarks
(1)		s the operator have copies of the manifest ilable for review? 262.40		-	ELECTIVE ELEM	
(2)	mon	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.	<u>o</u>			
(3)	fol cop fes	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manities) that do not contain the critical ments). 262.21				
	a.	Manifest document number?				
	b.	Name, mailing address, telephone number, and EPA ID number of Generator			4	distillation of Millians beautiful principles are no secure trape, approximately account of the security of the
	с.	Name and EPA ID Number of Transporter(s)?				SHARELINE WASTE
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?				TRICIL
	е.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?				Corrosive
	f.	The total quantity of waste(s) and the type and number of containers loaded?	<u>~</u>	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		ORM-A
	g.	Required certification?	<u>_</u>			
	h.	Required signatures?	<u>_</u>	,- 		
(4)	Rep	ortable exceptions 262.42				
	a.	For manifests examined in (2) (except for senter the number of manifests for which the signed copy from the designated facility with ment.	e gene	rator	r has N	OT received a
	b.	For manifests indicated in (4a), enter the has submitted exception reports (40 CFR 263 tor.	numbe 2.42)	er for to th	r which ne Regi	n the generator onal Administra-

Sec	tion	C: PRE-TRANSPORT REQUIREMENTS (Part 262, Su	bpart C)		•
. ———			YES	ΝО	NI	Remarks
1.	with (Red	vaste packaged in accordance n DOT regulations? quired prior to movement of	1	. ·		
		ardous waste off-site) 262.30	<u></u>			
2.	in a cond (Red	waste packages marked and labeled accordance with DOT regulations cerning hazardous waste materials? quired for movement of hazardous te off-site) 262.31 262.32	<u>v</u>	on Charles and Cha		
3.		required, are placards available to nsporters of hazardous waste? 262.33	1			
4.	was with and to	site accumulation of generated hazardous wast te it generates either (A) in its storage fac h 40 CFR 262.34 [see 265.1(c)(7)]. Option B containers. If the installation elects opt Section D. If the installation elects option ns: See 40 CFR 262.34 January 1], 1982 Rev	cility restri ion A, n B, co	[265] cts { checl	.l(b)_ all ac k this	or (B) in accordance cumulation to tanks box and skip
	a.	Is each container clearly marked with the start of accumulation date?	<u> </u>	·		
	b.	Have more than 90 days elapsed since the date inspected in (a)?				OUER -LIMIT DUE TO REJECTION OF RECENT SHIPMENT.
	c.	Do wastes remain in accumulation tanks for more than 90 days?		L	_	
	d.	Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?			***************************************	
\$e	ctior	D: - RECORDKEEPING AND REPORTING (Part 262,	Subpar	t D)		
			YES	NO	NI	Remarks
1.	nee mir	e all test results and analyses eded for hazardous waste deter- nations retained for at least ree years? 262.40				
<u>Se</u>	ction	n E: - INTERNATIONAL SHIPMENTS (Part 262, Sub	opart E)		
1.	Ha: exp	s the installation imported or ported Hazardous Waste? 262.50				
	(It	f answered Yes, complete the following applicable.)				
	a.	Exporting Hazardous waste; has a generator:				

		,	YES	NO	NI	Remarks		
i.		ified the Administrator in ting?				<u> </u>		
	îi.	Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?			THE COLUMN TWO IS NOT			
	iii.	Met the Manifest requirements?				A CONTRACT OF THE PARTY OF THE	,	
•	the g	ting Hazardous Waste; has enerator met the manifest rements?						

b

Appendix TR

Sect	ion A: SCOPE:	YES	NO	NI		Remarks
1.	Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.					COMPANY TRANSPORTS FOR WASTES FROM ITS OTHER AS TO SANFORD STREET FOR
2.	Does the transporter transport hazardous waste into the U.S. from abroad?		v			FURTHER RECUMM.
3.	Does the transporter transport hazardous waste out from the U.S.?	-				
4.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?					
Sec	tion B: MANIFEST SYSTEM AND RECORDKEEPING	(Part	263	<u>,</u> S	ub	part B)
1.	Are copies of completed manifests available for review and retained for three years. 263.22			• +		
2.	Estimate the number of manifests for shipments completed during the part 6 months.	2	. 5			
3.	Examine a representative number of manifests. Indicate number examined.	?	<u>/D</u>			<u>.</u>
4.	Did transporter properly sign and date the manifests examined?	1	***************************************	·		
5.	Do any manifests indicate shipments delivered to other than the designated facility? 263.21			<u> </u>		
	If (5) is "no," skip 6 and 7.					
6.	Do any manifests indicate shipments delivered to other than an alternate facility?		E	· «XXII	and the second	
7.	Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?	-			ecid way pro	

Sealed Power Corporation 100 Terrace Plaza P.O. Box 299, Muskegon, MI 49443 Telephone 616-724-5011, Telex 228464 Rich

SEALED POWER

MID 980 499755

October 28, 1985

REGETVEL

NOV 1 2 1985

SOLID WASTE BRANCH U.S. EPA. REGION V

Regional Administrator Region V United States E.P.A. 230 South Dearborn Street Chicago, IL 60604

Gentlemen:

This letter is to inform you of a manifest exception. On July 16, 1985, our Franklin, Kentucky, plant sent three drums of trichloroethylene to our Sanford Street plant in Muskegon, Michigan, using Manifest No. 0525755 to be recycled. When the drums arrived at the Sanford Street plant, they were unloaded in the shipping department to await pickup by the maintenance department. The manifest was with the drums at this time. The drums were subsequently picked up by the maintenance department and taken to the recovery still for recycling. At the time this shipment was received, there were some personnel changes taking place in the shipping department. In the confusion that insued, the manifest was separated from the drums, and we are now unable to locate any copies of the manifest.

Because of this situation, we are unable to administratively verify, through the use of paperwork, that the material was properly handled. However, in discussing the situation with all involved personnel, I am 100% sure that the trichloroethylene was indeed properly handled and recycled.

If you have any questions, please call me at 616/724-5788. Thank you.

Sincerely,

Paul A. Parker

Administrative Assistant

land a. Parker

0642/mtm

cc: D. Girvan

C. Kirby



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
E R. CAROLLO
ENE J. FLUHARTY
E. HEN F. MONSMA
O. STEWART MYERS
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

State Office Building 350 Ottawa, N. W. Grand Rapids, MI 49503 Phone: 456-5071 April 16, 1985

Mr. Danial T. Girvan Sealed Power Corporation 100 Terrace Plaza Muskegon, MI 49443

RE: MID 980499735 (Sanford Street Plant)

Dear Mr. Girvan:

This correspondence is written to acknowledge receipt of your letter dated April 1, 1985, which itemizes actions taken by the company to correct deficiencies noted during the RCRA inspection on March 6, 1985.

Therefore, this is to notify you that at this time the company has corrected the violation(s) identified in the compliance letter of March 13, 1985, with regard to the Resource Conservation and Recovery Act.

Sincerely,

Does M. Dethober

Dale M. DeKraker Water Quality Specialist Hazardous Waste Division

DMD/mn

cc: EPA Region V (w/enc.)

Al Howard, HWD

J. Bohunsky/C&E file, HWD

R1026-1

SEALED POWER

APR 2 1985

HAZARDOHS WASTE DIVISION

April 1, 1985

Ronald C. Waybrant, Ph.D.
District Supervisor
Hazardous Waste Division
Department of Natural Resources
State Office Building
350 Ottawa, N. W.
Grand Rapids, MI 49503

Dear Dr. Waybrant:

Re: MID 980499735

During the hazardous waste storage facility inspection of our Sanford Street plant, three items were noted which we have since corrected.

- A detailed waste analysis plan is now in place at the facility and will soon be implemented.
- (2) The format for a written inspection schedule has been developed and is now in place at the facility and is being initialed on a daily basis by the inspector.
- (3) A format for an operating record has been developed and is also in use at the facility.

Copies of all three of these items have been attached to this letter for your inspection. I believe that these forms cover all of the pertinent points, but if you feel that something else should be added, please let us know.

I believe that these actions will satisfy the concerns expressed in your March 13, 1985, letter and that we are now operating in compliance with all applicable rules.

Sincerely,

Daniel T. Girvan

Environmental and Energy Manager

0318/mtm

Attachments

XC: EPA REGION I

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON F. B. CAROLLO .ENE J. FLUHARTY ... PHEN F. MONSMA O. STEWART MYERS RAYMOND POUPORE HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

State Office Building 350 Ottawa, N. W. Grand Rapids, MI 49503 Phone: 456-5071 March 13, 1985

Mr. Danial T. Girvan Sealed Power Corporation 100 Terrace Plaza Muskegon, MI 49443

RE: MID 980499735

Dear Mr. Girvan:

On March 6, 1985, staff of the Department of Natural Resources conducted an investigation as an agent of U.S. EPA of your facility located at 2001 Sanford Street, Muskegon, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. A copy of the completed RCRA inspection form is enclosed.

As a result of the investigation, staff of the Department of Natural Resources determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that the following requirement(s) were not being met:

- 1) The company does not have a detailed waste analysis plan at the facility as required by 40 CFR, Part 265.13(b).
- 2) The company does not have a written inspection schedule available at the facility as required by 40 CFR, Part 265.15(b). Also, the existing inspection log does not include the name of the inspector or the date and nature of remedial actions as required by 40 CFR, Part 265.15(d).
- 3) The facility has no operating record as required by 40 CFR, Part 265.73.

We request that you respond to this letter by April 1, 1985, providing documentation to this office regarding those actions being taken to correct the above stated violations and correction of same violations prior to May 1, 1985. The DNR will evaluate your response and forward a copy of the response to the U.S. EPA along with a recommendation on your facility's compliance status.

Page 2 Sealed Power Corporation March 13, 1985

If you have any questions, feel free to contact Dale DeKraker and address your response to the address on this letter.

Sincerely,

Ronald C. Waybrant

Ronald C. Waybrant, Ph.D. District Supervisor Hazardous Waste Division

RCW/DMD/mn

cc: EPA Region V (w/enc.)

Enclosure

BOHUNSK CAE

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

THOMAS J ANDERSON F R CAHOLLO

HOUSE A HOEFER TEPHEN F. MONSMA

HLARY F SNELL AULH WENDLER HARRY H WHITELEY JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

BONALD O. SKOOG, Director 350 Ottawa Avenue, N. W. Grand Rapids, Michigan 49503

March 12, 1984

Mr. Daniel T. Girvan Sealed Power Corporation 100 Terrace Plaza Muskegon, MI 49443

270 ONO 580

Dear Mr. Girvan:

The purpose of this letter is to document our discussions on March 7, 1984 at your Sanford Street facility regarding the company's current practice of recycling its waste trichloroethylene still bottoms. This arrangement involves the transport of this waste from various Sealed Power facilities to the Sanford Street facility where it is further distilled to recover additional material. The clean solvent is then returned to stock for re-use and the remaining byproduct oil sold for fuel.

While this activity is clearly exempt from regulation under Act 64 at the present time, there has been some uncertainty with respect to regulation under RCRA. 40 CFR, Part 261.6(b) clearly requires that certain listed hazardous wastes be regulated even if they are to be recycled. Trichlcroethylene still bottoms (F002) is one such hazardous waste and thus, regulations for the generation, transportation, and storage of this waste would normally be in full effect.

However, there has been some on-going question if the material constitutes a waste per se, or an in-process material. Sealed Power has taken the position that it is an in-process material and hence has not been applying RCRA regulations to the process. In discussion with EPA, however, we have been informed that this procedure is regulated and falls within the intent of the RCRA statute. Therefore, to gain compliance and to continue to operate under the existing format, the following adjustments must be made in the recycling operation:

1. Those facilities currently generating the material must include it in their hzardous waste volume determinations and begin to handle the material as a bona fide hazardous waste. Accumulation time limits, container/tank labeling requirements, and other requirements outlined in 40 CFR, Part 262 of RCRA (generator section) now apply. In addition, a manifest must now be utilized by each facility to transport the waste to the Sanford Street plant.

Mr. Daniel T. Girvan 3/12/84 page two

- 2. The waste must be transported by the company's licensed hazardous waste transport vehicles, using the manifest previously indicated.
- 3. The receiving facility (Sandford Street) must obtain interim status to receive and store the waste prior to reclamation. The current Part A application lists only a TOI process code and does not authorize any storage activity. Consequently, the existing Part A must be amended to permit this activity. We recommend that a letter of explanation also be sent to EPA along with the revised application so that they are aware of the situation. Mr. Joe Boyle (312-886-7457) should be contacted with any questions about this revision. The Sanford Street facility will also be required to comply with the applicable Part 265 standards for TSD operations such as closure plans, financial insurance, inspection schedules, logs, etc.

While some of these requirements are already being met (contingency plan, personnel training) there will obviously be some increased documentary requirements. It was agreed that the company would review the requirements of Parts 264 and 265 and then decide on a final course of action. We would request that this question be resolved by not later than April 1, 1984, and a written response be filed with our office by this time.

If you should have additional questions, please contact our office.

Sincerely,

Does on De Rober

Dale M. DeKraker, Water Quality Specialist Hazardous Waste Division (616) 456-5071

DMD:bjc

HA-REGION V

RCRA Inspection Report

Identification Number: M I	480499	7735
Installation Name: SEALED POW	ER CORPORATION	
Location Address: 2001, SAI	WEORD STREET	
city: MUSKEGON	State: MICHIGAN	1
Date of inspection: 3/6/85	Time of inspection (from)	9:30AM (to) 2:30PM
Person(s) interviewed	Title	Telephone
Mr DANIAN T. GIRUAN	ENUIRONMENTAL ENGINEER	(616) 724 - 5235

Inspector(s) DALE DEKRAKER	Agency/Title MICHIGN DNR	Tel ephone (6/6) 456-507/
Installation Activity (mark only one	box)	Inspection Form(s)
Treatment/Storage/Disposal per 40 Generation and/or Transportation	CFR 265.1 and/or	(A)
Treatment/Storage/Disposal (no ge	neration or Transportation)	A
☐ Generation and Transportation		8, C
☐ Generation only		В
TT Transportation only		C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

- 23

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- 2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

<u>Permit appli</u>	catio	n process(es) (EPA Form 3510-3)	Inspection Form	A section(s)
S01	П	storage in containers		ĭ
\$02	X	storage in tanks		①
TOI	П	treatment in tanks		J
\$04	П	storage in surface impoundment		K,F
T02		treatment in surface impoundment		K,F
D83	\prod	disposal in surface impoundment		K,F
\$03	П	storage in waste pile		L
D81	ŢŢ	disposal by land application		M,F
D80		disposal in landfill	•	N,F
. Т03	П	treatment by incineration		0/P
T04	П	treatment in devices other than t impoundments are incinerators	anks, surface	Q
Other activities	<u>.</u>			
GENERATOR	X		APPENDIX	(IN)
TRANSPORTER	X	े "अर्थ ३७ ट्रिंग -	APPENDIX	TR
5. -		•		

 Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

NONE

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

NONE

in red by

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B) NI* YES NO. Remarks 1. Has the Regional Administrator been notified regarding: 265.12 Receipt of hazardous NO WASTES From FOREIGN waste from a foreign source? SOURCES NO EXPANSIONS Facility expansion? NO CHANGES HAVE OCCURED Change of owner or operator? General Waste Analysis: 265.13 a. Has the owner or operator obtained a detailed chemical and physical ERY BASIC. BUT ADAGUATE analysis of the waste? FOR COMPANY'S NEEDS Does the owner or operator have a detailed waste analysis plan on file at the facility? PLAN NOT AUGLABLE BUT BEING PREDORED. c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? MUST BE INCLUDED IN PLAN-COMPANY DOES RECIEVE WASTE SOLUENT STILL BOTTOMS FOR Security - Do security measures include: RECLAM. (if applicable) 265.14 BURNS SECURITY SERVICE a. 24-Hour surveillance? or i. Artificial or natural FEUCED barrier around facility? and 24 Hour - 5 DAY OPERATION ii. Controlled entry? Danger sign(s) at entrance? Owner or operator inspections: 265.15 Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?

	have	the owner or operator an inspection schedule he facility?		NO FORMAL SCHEDULE
	c. If s the item	o, does the schedule address inspection of the following ss:		EXISTS - WILL BE PREPARED
	i.	monitoring equipment?		
	ii.	safety and emergency equipment?		
	iii.	security devices?		
	iv.	operating and structural equip- ment (i.e. dikes, pumps, etc.)?		
	٧.	type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?		
	vi.	inspection frequency (based upon the possible deterioration rate of the equipment)?		
	d. Are ed	areas subject to spills inspect- daily when in use?	<u> </u>	
	an	s the owner or operator maintain inspection log or summary of er or operator inspections?	<u> </u>	
	f. Doe fol	s the inspection log contain the lowing information:	•	
	· i.	the date and time of the inspection?	<u> </u>	
•	ii.	the name of the inspector?		WILL BE ADDED
	iii.	a notation of the observations made?	<u> </u>	
	iv.	the date and nature of any repairs or remedial actions?		
5.		training records 265.16	,	
	a. Jo	b titles?	<u> </u>	
	b. Jol	b descriptions?	<u> </u>	

			YES NO	ΝI	Remarks
	c.	Description of training?	Y _	-	MICH. STATE UNIVERSITY
	d•	Records of training?	<u> </u>		JUDUSTRIAL TRAINING PROGRAM
	e.	Did facility personnel receive the required training by 5-19-81?	· 1		NEW Prospan -
	f.	Do new personnel receive required training within six months?	<u> </u>	RATE OF THE STATE	
	9•	Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<u> </u>		FEBRUARY, 1985
•	req	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.1	7	,	•
	ā.	Special handling?	accominate the second	V	WASTES ARE NOT IGNITABLE
	b.	No smoking signs?			OR REACTIVE
	C•	Separation and protection from ignition sources?		¥	-

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

l •	Maintenance and Operation of Facility: 265.31	YES NO	NI	Remarks
	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	_ \(\)		FACILAT INDOORS - NO HISTORIC
2.	If required, does the facility have the following equipment: 265.32			Losses.
	a. Internal communications or alarm systems?	<u> </u>	· 	· · · · · · · · · · · · · · · · · · ·
	b. Telephone or 2-way radios at the scene of operations?	<u>_</u>	••••••	TELEPHONES
	c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	<u> </u>		ALL EQUIPMENT
	Indicate the volume of water and/or foa	am available	for fi	re control:
	UNLIMITED SUPPLY From	CITY AN	so u	DELLS
	,			
3.	Testing and Maintenance of Emergency Equipment: 265.33			
	a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	<u> </u>		TESTED QUARTERLY
	b. Is emergency equipment maintained in operable condition?	<u> </u>		
4.	Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	<u> </u>		TELEPHONES WITHIN 40
5.	Is there adequate aisle space for unobstructed movement?	<u> </u>		
6.	Has the owner or operator attempted			
	to make arrangements with local authorities in case of an emergency at the facility?	<u> </u>		FIRE DEPARTMENT
		C-1		4/82-A

YES NO NI Remarks

١.	Does the	Contingency	Plan	contain	the
	followin	g information	n:	265.52	

- a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
- b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
- c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

1/		WELL WEITTEN PLAN	

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V		

La Carrie		•

NATURE OF WASTE NOT LIKE
TO CAUSE AN EMPLOYMON .

NOT TET DISTRIBUTED TO
OFF- SITE GROUPS, BEING
PERFORMED.

	Ema	rgency Coordinator 265.55			
د	LINE	200105			
	a.	Is the facility Emergency Coordinator identified?	_		Mr JACE THOMPSON
	b.	Is coordinator familiar with all aspects of site operation and emergency procedures?	<u> </u>	******	·
	с.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u> </u>	4 0 0,	
•	Eme	rgency Procedures 265.56			•
	at Co	an emergency situation has occurred this facility, has the Emergency ordinator followed the emergency occedures listed in 265.56?		V	PLAN HAS NEVER BEEN

YES NO

NI

Remarks

		<u>S</u>	ection E:	MANIFES	T SYSTEM,	RECOR	RDKEE	PING,	AND REP	ORTING:	(Part	265 Sub	part E)	
							YES	NO	NI	Remarks	}			
٦.	Use	of M	anifest Sy	stem ?	265.71									
	a.	proc proc (Par the gene	the faciledures lisessing each ticularly signed marator with very.)	ted in § ch manife sending nifest ba	265.71 for st? a copy of ack to the	·	~	-				SENT 84 ER PLA		<u> </u>
	b.		records of		ipments		Y				· · · · · ·			
2.	req	uirem	owner or ents regar ncies?				Ľ	,	•				*	
of	on-s	ite f	le to own acilities waste from	that do	not	s.								-
3.	0pe	ratir	ng Record	265.73									-	
	ā.	mair	the owne ntain an o ord as req .73?	perating	rator			V	**************************************	No		ak ofer	ATTING R	ECORI
	b.	cont	the oper tain the f ormation:		cord					AUG	LI4Bl	c		
		i.	The metho of each w storage, required Appendix	aste's t or dispo in 40 CF	reatment, sal as	5	<u> </u>	K			 		· · · · · · · · · · · · · · · · · · ·	 -
		ii.	The locateach haza facility? should be to specifif waste by a mani	rdous wa (This cross-r ic manif was acco	ste withi informati eferenced est numbe	n the on l		V	,	ONL	رره 1	E TAN	ζ	
	ታ ሉ ተ	i ii.	A map or cell or c											
	***		- applies t lities	o dispos	al		E-	1					4/82-A	

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

- iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?
- v. Reports detailing all incidents that required implementation of the Contingency Plan?
- vi. All closure and post closure costs as applicable?
- 4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

- **Unmanifested Waste Reports 265.76
 - a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?
 - b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

WILL INCLUDE MAP

IM PLEMENTED .

OPERATING RECORD

^{**} Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

YES NO NI Remarks

plan available for inspection? b. Does the plan identify: i. maximum extent unclosed during facility life? ii. maximum hazardous waste inventory? iv. estimated year of closure? v. schedule of closure activities? c. Has closure begun? a. Is the post-closure plan available	٦.	Clo	sure	265	5.112					
b. Does the plan identify: i. maximum extent unclosed during facility life? ii. maximum hazardous waste inventory? iv. estimated year of closure? v. schedule of closure activities? c. Has closure begun? b. Does this plan contain: i. description of groundwater monitoring activities and frequencies? ii. description of maintenance activities and frequencies? ii. description of maintenance activities and frequencies? AA. integrity of cap, final cover, or containment structures, where applicable BB. facility monitoring equipment iii. name, address, and phone number of person or office to contact during post-closure care period? c. Has the post-closure period begun? d. Is the written post-closure cost		a∙					<u> </u>			PLAN IS QUITE BASICAND COULD BE MORE SPECIFIC
ing facility life? ii. maximum hazardous waste inventory? iv. estimated year of closure? v. schedule of closure activities? c. Has closure begun? 2. Post-Closure 265.118 a. Is the post-closure plan available for inspection? b. Does this plan contain: i. description of groundwater monitoring activities and frequencies? ii. description of maintenance activities and frequencies for AA. integrity of cap, final cover, or containment structures, where applicable BB. facility monitoring equipment iii. name, address, and phone number of person or office to contact during post-closure care period? c. Has the post-closure period begun? d. Is the written post-closure cost		b.	Does	s the	plan identify	/; ·				CLOSURE EVENTS AND THE
ii. maximum hazardous waste inventory? iv. estimated year of closure? v. schedule of closure activities? c. Has closure begun? 2. Post-Closure 265.118 a. Is the post-closure plan available for inspection? b. Does this plan contain: i. description of groundwater monitoring activities and frequencies? ii. description of maintenance activities and frequencies for AA. integrity of cap, final cover, or containment structures, where applicable BB. facility monitoring equipment iii. name, address, and phone number of person or office to contact during post-closure care period? c. Has the post-closure period begun? d. Is the written post-closure cost			i.				<u> </u>			TIME REQUIRED FOR EACH
v. schedule of closure activities? c. Has closure begun? 2. Post-Closure 265.118 a. Is the post-closure plan available for inspection? b. Does this plan contain: i. description of groundwater monitoring activities and frequencies? ii. description of maintenance activities and frequencies for AA. integrity of cap, final cover, or containment structures, where applicable BB. facility monitoring equipment iii. name, address, and phone number of person or office to contact during post-closure care period? c. Has the post-closure period begun? d. Is the written post-closure cost			ii.			waste in-	_		-	OPGRADING FUAN.
c. Has closure begun? 2. Post-Closure 265.118 a. Is the post-closure plan available for inspection? b. Does this plan contain: i. description of groundwater monitoring activities and frequencies? ii. description of maintenance activities and frequencies for AA. integrity of cap, final cover, or containment structures, where applicable BB. facility monitoring equipment iii. name, address, and phone number of person or office to contact during post-closure care period? c. Has the post-closure period begun? d. Is the written post-closure cost			iv.	esti	mated year of	closure?	<u> </u>			2005 A.D.
a. Is the post-closure plan available for inspection? b. Does this plan contain: i. description of groundwater monitoring activities and frequencies? ii. description of maintenance activities and frequencies for AA. integrity of cap, final cover, or containment structures, where applicable BB. facility monitoring equipment iii. name, address, and phone number of person or office to contact during post-closure care period? c. Has the post-closure period begun? d. Is the written post-closure cost			٧.	sche	dule of closur	re activities?	<u> </u>			
a. Is the post-closure plan available for inspection? b. Does this plan contain: i. description of groundwater monitoring activities and frequencies? ii. description of maintenance activities and frequencies for AA. integrity of cap, final cover, or containment structures, where applicable BB. facility monitoring equipment iii. name, address, and phone number of person or office to contact during post-closure care period? c. Has the post-closure period begun? d. Is the written post-closure cost		с.	Has	clos	ure begun?		<u>\</u>		_	
b. Does this plan contain: i. description of groundwater monitoring activities and frequencies? ii. description of maintenance activities and frequencies for AA. integrity of cap, final cover, or containment structures, where applicable BB. facility monitoring equipment iii. name, address, and phone number of person or office to contact during post-closure care period? c. Has the post-closure period begun? d. Is the written post-closure cost	2.	Pos	st-Cl	osure	265.118					
i. description of groundwater monitoring activities and frequencies? ii. description of maintenance activities and frequencies for AA. integrity of cap, final cover, or containment structures, where applicable BB. facility monitoring equipment iii. name, address, and phone number of person or office to contact during post-closure care period? c. Has the post-closure period begun? d. Is the written post-closure cost		a.		•		lan available			/	POST CLOSURE NOT REDUR
monitoring activities and frequencies? ii. description of maintenance activities and frequencies for AA. integrity of cap, final cover, or containment structures, where applicable BB. facility monitoring equipment iii. name, address, and phone number of person or office to contact during post-closure care period? c. Has the post-closure period begun? d. Is the written post-closure cost		b.	Doe	s thi	s plan contair	n:				• • • • • • • • • • • • • • • • • • •
activities and frequencies for AA. integrity of cap, final			i.	moni	itoring activit					
cover, or containment structures, where applicable BB. facility monitoring equipment iii. name, address, and phone number of person or office to contact during post-closure care period? c. Has the post-closure period begun? d. Is the written post-closure cost			ii.	acti						
ment iii. name, address, and phone number of person or office to contact during post-closure care period? c. Has the post-closure period begun? d. Is the written post-closure cost				AA.	cover, or constructures,	ntainment				
iii. name, address, and phone number of person or office to contact during post-closure care period? c. Has the post-closure period begun? d. Is the written post-closure cost				BB.	-	itoring equip-				
c. Has the post-closure period begun? d. Is the written post-closure cost		i	iii.	of p	e, address, an person or offi	ce to contact		-		
		c.	Has							
		d.								

Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

1.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192	<u> </u>	***************************************	F001	STILL BOTTOMS
2.	Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?	<u> </u>		COVE	RED TANK - COLITAINED
3.	Do continuous feed systems have a waste-feed cutoff?		V	_B a t	CH ADDITION
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?	265.193	······································	<u>/</u>	WASTES PLACED IN TAME ARE ALWAYS THE SAME
5.	Are required daily and weekly inspections done? 265.194	\checkmark		-Modele	AKE ALWA 13 THE STINC
6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 26 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	65.198 		V	NOT IGNITABLE OF REACTIVE
7.	Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)	venatelisticus		V	NOT INCOMPATIBLE WASTES
8.	Has the owner or operator observed to buffer zone requirements for tanks c	he Nationa containing	l Fire	e Protec able or	reactive wastes?
	Tank capacity:gallons			. / .	
	Tank diameter:feet			NIA	
	Distance of tank from property li	ine		·	feet
	(See table 2 - 1 through 2 - 6 of Code - 1977" to determine complia	NFPA's "Fance.)	lamma	ble and	Combustible Liquids

Sec	cti	on	Α:	Scope
~~ '		\circ		00000

1.	hazar	lete this Appendix if the owner or operator rdous waste that is subsequently shipped off isposal.	of a f-site	TSD t	facilit treatm	y also generates ment, storage,
Sect	ion E	: MANIFEST REQUIREMENTS (Part 262, Subpart	tB)			
		•	YES	NO	NI	Remarks
(1)	Does ava	s the operator have copies of the manifest ilable for review? 262.40	\checkmark			
(2)	mon:	nine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period. 35	-40			
(3)	fol cop fes	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manities) that do not contain the critical ments). 262.21				
	a.	Manifest document number?	<u>/</u>			
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	<u> </u>		◀	
	с.	Name and *EPA ID Number of Transporter(s)?	<u> </u>	, 	<u>.</u>	SHOREUNE WASTE
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	×	<i>_</i>		TRANSPORTATION TRICIL ENVIRONMENT SERVICES
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	L	•		Corrosive
	f.	The total quantity of waste(s) and the type and number of containers loaded?	V			BULK
	g.	Required certification?	V	/		DRUMS
	h.	Required signatures?	~	, 		
(4)	Rep	portable exceptions 262.42				+
	a.	For manifests examined in (2) (except for enter the number of manifests for which the signed copy from the designated facility whent.	ne gen	erato	or has	NOT received a
	b.	For manifests indicated in (4a), enter the has submitted exception reports (40 CFR 26 tor.	e numb 52.42)	er fo	or whiche Reg	th the generator gional Administra-

Sect	ion	C: PRE-TRANSPORT REQUIREMENTS (Part 262, Su	bpart (2)		
1.	with (Rec	waste packaged in accordance n DOT regulations? quired prior to movement of ardous waste off-site) 262.30	YES	NO	NI	Remarks
2.	in a cond (Red	waste packages marked and labeled accordance with DOT regulations cerning hazardous waste materials? quired for movement of hazardous te off-site) 262.31 262.32	<u>√</u>			
3.		required, are placards available to nsporters of hazardous waste? 262.33	\checkmark			
4.	was with and to	site accumulation of generated hazardous wast te it generates either (A) in its storage fac h 40 CFR 262.34 [see 265.1(c)(7)]. Option B containers. If the installation elects opt Section D. If the installation elects option ns: See 40 CFR 262.34 January 11, 1982 Rev	cility restri ion A, n B, co	[265. cts a check	l(b)] ll acc this	or (B) in accordance cumulation to tanks box and skip
	a.	Is each container clearly marked with the start of accumulation date?	V	,		
	b.	Have more than 90 days elapsed since the date inspected in (a)?		<u> </u>		
	с.	Do wastes remain in accumulation tanks for more than 90 days?	V			WASTES PUMPED DIRECTLY From TANKS
	d.	Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	Q ab 151 Mellenyge	49-10-10-10	V	NO FORMAL ACCOMULAT
Sec	tion	D: - RECORDKEEPING AND REPORTING (Part 262,	Subpar	rt D)		OF GENERATED WASTED
1.	nee min	e all test results and analyses eded for hazardous waste deter- nations retained for at least ree years? 262.40	YES	NO	NI 	Remarks
Sec	ction	n E: - INTERNATIONAL SHIPMENTS (Part 262, Sub	part E)		·
1.		s the installation imported or ported Hazardous Waste? 262.50		V		
		answered Yes, complete the following applicable.)	•			
	a.	Exporting Hazardous waste; has a				

Appendix TR

Sect	tion A: SCOPE:	YES	NO	NI	Remarks
1.	Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.	<u> </u>	/	-	COMPANY TRANSPORTS SOLVENS TO ITS OWN FACITY FOR RECLAIM
2.	Does the transporter transport hazardous waste into the U.S. from abroad?		V		JUST From OTHER COMPAN DLANTS WITHIN THE U
3.	Does the transporter transport hazardous waste out from the U.S.?			<u> </u>	popular vie u
4.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?		<u> </u>		
Sec	tion B: MANIFEST SYSTEM AND RECORDKEEPING	(Par	t 263	3, Sub	part B)
1.	Are copies of <u>completed</u> manifests available for review and retained for three years. 263.22	V		_	
2.	Estimate the number of manifests for shipments completed during the part 6 months.	_2	25 -	·30	_
3.	Examine a representative number of manifests. Indicate number examined.	nerite ministration in	25	-3	<u>o</u>
4.	Did transporter properly sign and date the manifests examined?	V	·	-	
5.	Do any manifests indicate shipments delivered to other than the designated facility? 263.21				
	If (5) is "no," skip 6 and 7.				
6.	Do any manifests indicate shipments delivered to other than an alternate facility?	-	···	· · ·	
7.	Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?		<u></u>	·	

Sealed Power Corporation
100 Terrace Plaza
Box 299, Muskegon, MI 49443 Telephone 616-724 1, Telex 228464

Code: 3
Status: A
8/12/83 - Olw
8/12/83 - Olw

RECEIVED

JUL 1 8 1983

HAZARDOUS WASTE DIVISION

July 15, 1983

Mr. Ronald C. Waybrant, Ph.D. Department of Natural Resources 350 Ottawa Avenue, N. W. Grand Rapids, MI 49503

Dear Mr. Waybrant:

In response to your letter of May 2, 1983, we have taken steps to correct the three problems that were identified during our RCRA inspection of April 28, 1983.

In reference to item #1, we are conducting an investigation with both our own personnel department and the University of Michigan to establish both a training program and a records system for all individuals that may handle hazardous waste. For item #2, we are currently receiving bids from several consulting firms for the purpose of building a contingency plan for the sanford Street facility. In the past, we have prepared these plans with our own in-house staff, but our present work load just does not allow time to continue this practice. For item #3, the tank containing the hazardous still bottoms was labeled the day of the inspection, and we achieved compliance with this requirement on April 28, 1983.

I will attempt to update the progress of these efforts as new information becomes available, and I hope that we will be allowed the time to establish these programs. If you have any questions that I can be of any additional assistance, please contact me.

Sincerely,

Dan Girvan

Daniel T. Girvan, P.E. Environmental and Energy Manager

0275/mtm

cc: D. DeKraker

XC EPA RECION I COMPLIANCE SECTION -CANSING L NATURAL RESOURCES COMMISSION Code X

JACOB A HOEFER
E. M. LAITALA

HILARY F. SNELL

JOAN L. WOLFE CHARLES G. YOUNGLOVE

PAUL H. WENDLER HARRY H. WHITELEY

STATE OF MICHIGAN



WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

350 Ottawa Avenue, N. W. Grand Rapids, Michigan 49503

May 2, 1983

STAT # NEEDED

5

Mr. Daniel T. Girvan

Sealed Power Corporation
100 Terrace Plaza
Muskegon, MI 49443:

MID 980499735

Dear Mr. Girvan:

On April 28, 1983, staff of the Department of Natural Resources conducted an investigation of your facility located at 3001 Sanford Street in Muskegon, Michigan to evaluate compliance of that facility with requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended. The completed RCRA inspection forms are enclosed.

As a result of that investigation, staff of the Department of Natural Resources have determined that the facility is in violation of the requirements of subtitle C of RCRA. Specifically, staff found that:

- 1. Personnel training records are not available as required in 40 CFR, Part 265.16.
- 2. The Contingency Plan and Emergency Procedures are not available as required in Part 265, Subpart D.
- 3. The tank containing hazardous still bottoms from the reclamation of trichloroethylene was not labeled with the term "Hazardous Wastes" as currently required in Part 262.34(3).

We request that you respond to this letter by May 28, 1983, providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact Dale DeKraker at (616) 456-5071.

Sincerely,

HAZARDOUS WASTE DIVISION

Ronald C. Waybrant, Ph.D.

anald (h) mylmant

District Supervisor

RCW:bjc

cc: J. Bohunsky

EPA Reg. V (w/enc.)

enc.

action 3 x

RCRA Inspection Report

EPA	Identification Number:	98049	7 3 5		
Inst	allation Name: SEALEN Pows	R CORPORATION			
Loca	tion Address: '3001 SANFO	es Steget			
City	": MUSKEBONS	State: MICHICAN	I		
Date	e of inspection: 4/28/83	Time of inspection (from)	10:000m (to) 12:000m		
Pers	son(s) interviewed	Title	Tel ephone		
M	NIAL GIRVAN	ENGINEERS ENGINEERS	(616) 724-5011		
	pector(s)	Agency/Title MICHIGAN DAR (CA WATER PURLIT SPECALIT	Telephone 6) 456-6231		
I ns	tallation Activity (mark only on	e box)	Inspection Form(s)		
П	Treatment/Storage/Disposal per 4 Generation and/or Transportation	0 CFR 265.1 and/or	А		
II	Treatment/Storage/Disposal (no g) A			
\overline{X}	Generation and Transportation	(B, C)			
II	Generation only		В		
TT	Transportation only		C		

INSPECTION FORM B

Section A: Scope of inspection

Standa	rds	for generators of HAZARDOUS WASTE subject to	40 CF	R 262	2.10	
Sectio	n B:	MANIFEST REQUIREMENTS (Part 262, Subpart B))		·	
			Yes	No	NI*	Remarks
(1)	Doe ava	s the generator have copies of the manifest ilable for review? 262.40	X	ESSENTATION OF THE STATE OF THE		
(2)	mon	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.		nation and values		
(3)	fol cop	the manifest forms examined contain the lowing information? (If possible, make 262 ies of, or record information from, manifests t do not contain the critical elements)		Mandagan mada bir sam		
	â٠	Manifest document number?	X	e e-verses/2.45	-	
	b.	Name, mailing address, telephone number, and EPA ID number of generator?		≽ (S∳G∰unim)-maj	nn 1996/99/c/Stanovich	The Section of the se
	C.	Name and EPA ID number of transporter(s)?	- <u>X</u>	in Therapping Till-1	L. CONTRACTOR CONTRACTOR	
	d.	Name, Address, and EPA ID Number of designat permitted facility and alternate facility?	ed X_	No. Branch Control of Control	anne (ARTICLIONICA) (ARTICLIONICA)	
	е.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	ng <u>X</u>	en darffölkensse versiske s	Co- manuscribes deller meddings,	HATARD CLASS
	f,	The total quantity of waste(s) and the type and number of containers loaded?	X	· dominion	no	MISSING ON
	g.	Required certification?	X	n simbolinish vens	The state of the s	en man and the same about the same about the same and the
	h.	Required signatures?		n vwnanna	manufactificate principal	eric distribution of an emphasization model, emphasization in production of a distribution in an accordance of
(4)	Rep	ortable exceptions 262.42				
	à.	For manifests examined in (2) (except for shwithin the last 35 days), enter the number of fests for which the generator has NOT received signed copy from the designated facility with days of the date of shipment.	of man red a	. m.		
	Ь.	For manifests indicated in (4a), enter the rewhich the generator has submitted exception				

Section C - PRE-TRANSPORT REQUIREMENTS (40 CFR Part 262 Subpart C)

			Yes	No	NI	Remarks
(1)	regulat	e packaged in accordance with DOT ions? (Required prior to movement rdous waste off-site) 262.30	<u>X</u>	un ellen vellen ess	mental des elements (1868)	
(2)	accorda hazardo	te packages marked and labeled in nce with DOT regulations concerning us waste materials? (Required prior ment of hazardous waste off-site)			262.32	
(3)	If requ transpo	ired, are placards available to rter? 262.33				
(4)	Pre-shi	pment Accumulation:				
à pe		to GENERATORS that store hazardous w hese items do not apply to generators				
		hazardous waste accumulated in con- ners? If no, skip to b. 262.34	X	- Amelican and Sendo	AP ANALA MINISTERIO (CONTROL CONTROL C	
	1.	Is each container clearly marked wit the date on which the period of accumulation began?		MANUFACT TROUGHAN	The second of th	
	ii.	Have more than 90 days elapsed since the dates marked?	44 470 480 EV 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	X	Stemas See 2 (2004) I which is standing	
		Is each container labeled or marked clearly with the words "Hazardous Wastes?"		-1400AU170-TD	and the second second	
	iv.	Are containers in good condition?	X	ale were medicane	of all wheels in surround	ынга калда жайы жайы төбөтетін беректін тара жашын арақ тақар ұрақ ұрақ арақ арақ арақ арақ арақ
	٧.	Are containers compatible with waste in them?	×	Seamelan conjugger		
	٧î。	Are containers managed to prevent leaks?	The state of the s	n a lemma and a cura		
	vii.	Are containers stored closed?	S	terna adominioamena	-3 m-servin various par	de novembre hill—limboholokokom nida nasanann muun muun maanna saasalehaa
	viii.	Are containers inspected weekly for leaks and defects?	X	DAMPINA AND AND A SECOND	No. control a Controllero.	stadion leaders to finade refig selection before efficient annual account rate of them
	ΪX«	Are ignitable and reactive wastes st at least 15 meters (50 feet) from th facility property line? (Indicate if waste is ignitable or reactive).	ie :	**************************************		NOT /WITAGLE

Section C - PRE-TRANSPORT REQUIREMENTS (40 CFR Part 262 Subpart C)

				Yes	No	ΝI	Remarks
	(1)	regulati	e packaged in accordance with DOT ions? (Required prior to movement dous waste off-site) 262.30	<u>X</u>	11/meterministe		
	(2)	accordar hazardou	te packages marked and labeled in nce with DOT regulations concerning is waste materials? (Required prior ment of hazardous waste off-site)			262.32	
	(3)	If requi	ired, are placards available to rter? 262.33				
**	(4)	Pre-ship	oment Accumulation:				
食力	a pe	ies only rmit. Th site.	to GENERATORS that store hazardous wa nese items do not apply to generators	iste oi Whose	n-sit wast	e for e is i	90 days or less without nmediately transported
			hazardous waste accumulated in con- ners? If no, skip to b. 262.34	X	ORNORED THEORYGO	gazzandekan samelen a Wireland St. de	grammatikan dilikon etin (1800-1809) (1800-1800) (1800-1800) (1800-1800) (1800-1800) (1800-1800) (1800-1800) (1800-1800)
		, de	Is each container clearly marked with the date on which the period of accumulation began?	n <u>X</u>	www.chi.ed c@inest@i	See Manager A montains	
			Have more than 90 days elapsed since the dates marked?	No. of Particular Security of Security	X	Street American Control Contro	
		iíi.	Is each container labeled or marked clearly with the words "Hazardous Wastes?"		will hadden to the Co		
		iv.	Are containers in good condition?	X.		effect withouther as the entity	
		∛ 9	Are containers compatible with waste in them?	*		CARD LI FRID SEPT.	n der Schrifte für 1880 in 1880
		VÌ»	Are containers managed to prevent leaks?	¥.	TO ATTACABOTIC STATE		
		vii.	Are containers stored closed?	X	Volument Street Walls	Service and a service and	
		viii.	Are containers inspected weekly for leaks and defects?	A	Vicinities and a particular and	opraelita, mossolemo	
		íx.	Are ignitable and reactive wastes st at least 15 meters (50 feet) from th facility property line? (Indicate if waste is ignitable or reactive).	8	manan, a norsa di		DOT / (WITAGLE

х.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)		and the same of th	X	
Хİ	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	e o o o o o o o o o o o o o o o o o o o	- Capadoja	X	
	hazardous waste accumulated in tanks? no, skip to c. 262.34 (January 11, 1982 revision)	X		and a grade of the state of the	FOOL STILL
i.	Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 262.34 (January 1982 revision)	TOTAL CONTRACTOR OF THE PARTY O	<u>X</u>	- Overnami (Malikus vergy	The state of the s
ii.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192	X	T if you the commission by the government	The State of the S	
iii.	Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	and the state of t		X	ELOT OPEN TOP
ív.	Do continuous feed systems have a waste-feed cutoff?	TO WAR THE PROPERTY OF THE PRO	er Benderfallend	· <u>×</u>	BATCH SYSTEM
٧.	Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193	ANNOUNT WATER AND	CHROCOLOGY IN COMPANY	· ····································	WASTE ALWASS
vi.	Are required daily and weekly inspections done? 265,194	_X	www.modeuma		F-00/
víi.	Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198	or-manufacture Value Gas	د محمد المحمد		
Viii.	Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199	estate es	المراوز والمراوز والم	· X	

Yes No

NI

Remarks

Yes No NI Remarks

	ix.	Has the owner or operator observed t buffer zone requirements for tanks c	he Nati containi	onal Fire ng ignita	e Protection Association Protection able or reactive wastes	on'. \$?
		Tank capacity:	pallons		10	
		Tank diameter:	eet		v(H	
		Distance of tank from property line	The state of the s		feet	
		(see tables 2-1 through 2-6 of NFPA' Code - 1977" to determine compliance	s "Flann .)	mable and	i Combustible Liquids	
C.		hazardous waste accumulated in other n tanks or containers?	**/***********************************	X		w~
d.	Per	sonnel training. 262.34 (a) 5				•
	Do inc	personnel training records lude: 265.16				
	1.	Job Titles?		<u>X</u>		
	ii.	Job Descriptions?	and the second s			
	iii.	Description of training?	_X_	AND THE RESERVE OF THE PARTY OF	DESCRIPTION GXISTS BUT NOT INCLUDED	g 4.
	iv.	Records of training?	**************************************		ANY EINO OF FORM	
	V *	Did personnel receive the required training by 5-19-81?				
	Vi.	Do new personnel receive required training within six months?	Name and American		- State Milliographic Colon - Incorporate Vision - American (III) - State Milliographic (III) - Incorporate Vision - American (III) - State Milliographic (III) - Incorporate Vision - American (III) - Incorporate Vision	73-40 <u>5</u> .
7	víi.	Do personnel training records indicate that personnel have taken part in an annual review of initial training?		<u> </u>		
e.	Pre	paredness and Prevention 265. Subpa	rt C			
	i.	Maintenance and Operation of Facility:			·	
		Is there any evidence of fire, explose release of hazardous waste or hazardowaste constituent? 265.31	sion, or ous			

ii.	Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	agent district trans	Χ.		
iji.	Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	<u>X</u> .	- English and Market and San	and the second s
ÍV.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	ologija Pirmoj, v	X	trongonthumagyanya, s	
٧.	An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)		www.montain-monta		WASTE WOULD NO REPORTE AND EVACUATION PLAN
νi.	Are copies of the Contingency Plan available at site and local emergency organizations?		<u>X</u> _	Artifolios en para l'ord parabiles	PERP OU SITE O
vii.	Is the facility emergency coordinator identified?	**************************************	<u>x</u>	militalitus gapan dalipus dilipus	M- GIRVAN
/111.	Is coordinator familiar with all aspects of site operation and emergency procedures?	X	وراسيوسانيوب	والاستان والمسالة وا	
įX.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?		***************************************		
X.	If an emergency situation has occured at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?	^*a, , , , , , , , , , , , , , , , , , ,	oris, produceros super	<u> X</u>	NO EMERGINO
					EX+? LEN

			,
ii.	If required, does this facility have the following equipment: 265.32		
	Internal communications or alarm systems?		TELEPHONES
	Telephone or 2-way Radios at the scene of operations?	<u> </u>	FIRE ALARMS
	Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?		SOSBANTS
	Indicate the volume of water and/or foam	available for	fire control:
	LUCIMITED CITY WAS		a sp. north, north or hand and quantity from the return and an indicated by managed the control of the control
	BULK CO2	and the second s	
iii.	Testing and Maintenance of Emergency Equipm	ent: 265.33	
	Has the owner or operator established testing and maintenance procedures for emergency equipment?	<u>X</u>	ALL TESTED
	Is emergency equipment maintained in operable condition?	<u> </u>	PJESTSAUQ
î۷.	Has owner/operator provided immediate access to internal alarms (if needed)?	X	
٧.	Is there adequate aisle space for unobstructed movement?	<u> </u>	
٧ĺ٠	Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	<u> </u>	FIRE DEAL
f. Co	ntingency Plan and Emergency Procedures 265	Subpart D	
	Does the contingency plan contain the following information:		
	i. The actions facility personnel must tak to comply with §265.51 and 265.56 in reto fires, explosions, or any unplanned of hazardous waste? (If the owner has Prevention, Control and Countermeasures Plan, he needs only to amend that plan incorporate hazardous waste management provisions that are sufficient to compl with the requirements of this Part (as applicable.) 265.52	esponse release a Spill s (SPCC) to	COMPANY HAS A PIPP BUT IT I UST COCSTAIN N OF THE REQUIR

Sectio	n D:	RECORDKEEPING AND REPORTING (Part 262, Sub	opart	D)		
		·	Yes	No	NI	Remarks
	hazar	ll test results and analyses needed for dous waste determinations retained for ast three years? 262.40	X	m style visite style	g_mericelum va	
Sectio	on E:	INTERNATIONAL SHIPMENTS (Part 262 Subpart 262.50	E)	·		
(1)		he installation imported or exported dous waste? If "no", skip a and b.	NA SALITY STREET,	X	A	
	a. E	xporting Hazardous Waste, has a generator:				
	i	. Notified the Administrator in writing?				and the fifth of the first and in the same of the same
	, .	Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	at-many controlling.	NA POPONÍ POLICON NO NA A	on an array	
	iii	. Met the Manifest requirements?	maka kara ana di karakana d	- SHARASSERTONIANA	······································	Start (14 COS) is a like the start of the st
		mporting Hazardous Waste, has the				

Remarks:	
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	en der Van der State der Australia der State (der Verbalbe) (der Verbalbe) von Verbalbe (der Verbalbe) von Verb
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	the CPT of the CPT of and Submitted Sub-Sub-Sub-Sub-Sub-Sub-Sub-Sub-Sub-Sub-

Inspection form (

		YL5	NO I	4 I	Remarks			
5031	ion A: SCOPE OF INSPECTION				5			
	Complete this inspection form for transporters of hazardous waste subject to 40 CFR 263.10.	X	gen eddiget typeldi M	anne de la cope				
2.	Does the transporter transport hazardous waste into the U.S. from abroad?	radiosol*slussion.	<u> </u>	w wyddin a'r ywydd No.		and one communication for the	liden – 1700 – January Lawrence (1888)	lland habridates vive republic a report of season
3.	Does the transporter transport hazardous waste out from the U.S.?		<u> </u>	lanner melaksah sar		د به شده در	. The second section is a second seco	ommerskale vergan op for varifier sake likelijens och slitte.
	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container.	Walking and Article and	X	Nagagaran sa sika a sik		an visional and a state of the	orden (1700) broken dinastro skrauge	no erigida sudik Augustus (Marijus)
Sec	tion B: MANIFEST SYSTEM AND RECORDKEEPING	(Par	t 263	, ડા	ubpart B)			
	Are copies of <u>completed</u> manifests available for review and retained for three years. 263.22	X.	e programa de la compa	SEASON I LINES ON LINE	an the same a subsection of the same of the same of	·	arrajima yangkan yang alap da Malikupakan	ngopogen - vicados de disconsissa
2.	Estimate the number of manifests for shipments completed during the part 6 months.	_X_	usa vonhudrantilla		18) The state of the	
3.	Examine a representative number of manifests. Indicate number examined.	5-4-viss	12		no maka wa			÷
4,	Did transporter properly sign and date the manifests examined?	X_	All and analysis of the	consequence of the	Marin - Andrea Marin American Primane		ra-addisiana arros su a programação	gyros, agen gyg an englandyd nab nyr malann yg
	Do any manifests indicate shipments delivered to other than the designated facility? 263.21	The Room of the Long To the Lo	X		, which is sensor which which can be sensored	and the same of th	- Maint - e e Tha n Millian anns aire an gail	والمواقعة المائية المائية والمائية المائية الم
	If (5) is "no," skip 6 and 7.	and an overland of the	••••••			man and an	· — v · · · · · · · · · · · · · · · · ·	to a recommendation assumed the design of the second states of the secon
€.	Do any manifests indicate shipments delivered to other than an alternate facility?	· · · · · · · · · · · · · · · · · · ·	, i s suriabet		e som	man o managan ang ang ang ang ang ang ang ang a	·	
1.	Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?	na sedan e s	n gradientste			— the section of a first leading of the section of	, , , , , , , , , , , , , , , , , , ,	number v '



JACOB Á. HOEFER

JACOB A. MOEFER
CARL T. JOHNSON
F. LAITALA
Y F. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

NATURAL RESOURCES COMMISSION

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

State Office Building 350 Ottawa N. W. Grand Rapids, Michigan 49503 Phone: 456-6232

April 15, 1982

Mr. Dan Girvan Sealed Power Corporation 100 Terrace Plaza Muskegon, MI 49443

Dear Mr. Girvan:

On March 17, 1982, staff of the Department of Natural Resources conducted an investigation of your facility located at 2001 Sanford Street in Muskegon, Michigan to evaluate compliance of that facility with requirements of subtitle . C of the Resource Conservation and Recovery Act (RCRA) as amended. The completed RCRA inspection form is enclosed.

As a result of that investigation, staff of the Department of Natural Resources have determined that the facility is in violation of the requirements of subtitle C of RCRA. Specifically, staff found that:

1. Personnel training records are not available as required in 40 CFR 265.16(b) and 265.16(d), (3) and (4).

2. A contingency plan and emergency procedures were not provided as required in 40 CFR 265.51 through 265.56.

Inspections required in 40 CFR 265.194(a), (4) and (5).

We request that you respond to this letter by May 10, 1982 providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter please feel free to contact me at (616) 456-6232.

Sincerely,

WATER QUALITY DIVISION

RE FIVED

APR 21 193 >

John Bantjes

Water Quality Specialist

JB/mam

CC: Al Howard, Office of Hazardous Waste Management, Env. Services Division LEPA Region V

John Bohunsky, Water Quality Division

MICHIGAN Enclosure

RCRA INSPECTION DEPORT - INTERIM STATUS, STANDARDS Form B Generator Inspection* (40 CFR Part 262)

1. General Information:*

	Nane	Agency/Title	Telephone
State of the state	Preparer Information	·	
	6. Per C P (2 mm) a terre () a secolar menali secolar menanci menanci menanci per control del secolar menancia del secolar menan	Special control of the control of th	The properties are a properties and the properties and the properties are a properties are a properties and the properties are a properties and the properties are a properties and the properties are a properties are a properties and the properties are a properties and the properties are a properties are a properties are a properties are a properties and the properties are a properties and the properties are a properti
	Inspection Participants	Agency/Title	Telephone Telephone Apprilia and a second
	the control of the co		understand und version (the second
The state of the s	Person(s) interviewed		
Section 20	Weather Conditions:		
politica or street or street	Date of Inspection: 3-17	Time of Inspecti	on (From) <u>1.32</u> (То) <u>12.30</u>
		•	net amen et nema tren rusan nave e samen sur ona a amen successo mena amenorea assur as menan successo sur en m Se la samen a samen successo anno a samen (E) Zip Code: (SCCC)
	Installation Name: Street: 2007		•

11. BRIEFLY DESCRIBE SITE ACTIVITY

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January of Journal Control of State	o residencia contro con con secreta como residencia con contra	on the month of the second of		Pauvid et Till 14 C Upvarienjalan	പ്രേക്കും പ്രവാധ പ്രത്യായിലും വരുന്നു. പ്രേക്കും പ്രവാധ പ്രത്യായിലും വരുന്നു. പ്രത്യാക്ക് പ്രത്യായിലും പ്രത്യായിലും പ്രത്യായിലും പ്രത്യായിലും പ്രത്യാ
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agency Common wife		waga () opa pisa o maga sa wakanadika	CONTRACTOR TO BANKING STATES	२ वर्ष-२१ काम्बर्गः । तथकान्त्रेद्रदशकाय	กระเทา เราะบาง
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62K-1.LAbara		o mare la colò della colò de galla colò de la colò	grobus sources of Consequences and	turkuu takko (**keessa assib	
	III. MANIF	EST REC	JUIREN	ENTS	
		part B		orturk of emillion Kolegogy	
	s the operator have copies	Ves	No	W. J. A.	Remarks .
	the manifest available for iew?	1310 South CXC 90s	1999 Reserved collists	1864 oto 4 Panago	the second secon
	the manifest forms reviewed tain the following information: possible, make copies of, or ord information from, manifests to not contain the critical ments)		·		
T is	Manifest document number?	A CONTRACTOR AND A CONTRACTOR A	Это не меную сийся.	Gringary Chapaily	enterwaysher, or you have established that the start of the place of t
2 =	Name, mailing address, telephone number, and EPA ID number of Generator?				*
40 x 25	Name and EPA ID Number of Transporter(s)?	mpuneren, ski vidilili olif esikingsis 2222i	ver-to-reflighteryter file. The to-to-construction	New Section (Spirite)	AND PARAMETERS AND THE PROJECT OF CONTROL OF THE PARAMETERS AND THE PA
4.	Name, Address, and EPA ID Number of Designated permitted facility and alternate facility?				
	o nome o no no mario de la	my control and the same	ાલ્યા છે. જેવા છે. જેવા છે.	UP-STEET-WAY JOSES	PROPERTY OF COLUMN TO A STATE

(A)

	100 P	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	an lawrowinati kendhakkikati sistemilikatika	Grand Love (littlig schorers nach verhallschallen state op till für Labe (littlig schare) er de	1807 david Historia u ninotyralmon rozan 1.5. post bila sinderksing 1. et 17 pillipiliyak makan
		The total quantity of waste(s) and the type and number of containers loaded?	29-15720 Williams Schaller Sch	On a "Makes she il surregione en compagni senge alastica de delektrone en comp	;
	**************************************	Required Certification?	- System Canadamin - NarabadaN Galap - Spenjalandelskeyn	The state of the comments of the comments of the comment of the comment of the comments of	usi kanada delakansa dalam
	(ii)	Required Signatures?	ർവത്തിന്റെ സംബക്തിക്ക് ത്രാക്തിരിക്ക്	en en vojer en efektivisk kommunist vojer en voje en trologija en trologija en e	recoveremental documents da experimental XVIIII (* 1-4888) por establica de la companya del companya del companya de la companya del la companya de la compa
		s the Owner or Operator Submit eption Reports when Needed?) Najar katakanganan negarangan penjada empenjanganan.	the county on the second of the county of th	ര്മ്മി വിത്രമ്മാരുന്നു വരം പരസംഭര്ത്തിലെ പരവുമ്മായിലെ നേന്നു വരുന്നു. ഇത് വരുന്നു വരുന്നു വരുന്നു വരുന്നു വരുന പരവുന്നു പരവുന്നു വരുന്നു പരവുന്നു വരുന്നു വരുന്നു വരുന്നു വരുന്നു വരുന്നു വരുന്നു. വരുന്നു വരുന്നു വരുന്നു വരു
		IV. PRE-TRAN	SPORT REQUIREMEN	415	
	anc (Re	waste packaged in accord- e with DOT Regulations? quired prior to movement hazardous waste off-site)	TOWNSTONE THE O	. And consider an all any secun money of person an analogue page cap capable page.	- St. Salleng Blev-Sta (and de Order was error in Schallanger v. De Green Schwede and de Fles secretary
	in Con (Re	waste packages marked and labeled accordance with DOT Regulations cerning hazerdous waste materials? quired prior to movement of ardous waste off-site)	againmententente against sustato mento constato suga	-constructional investments and construction of the construction o	oggennasie-b-ulugay azzwanyasanaza i izagou-jibri sag maagabbanan sabbibba-akk
(C)	If to	required, are placards available transporter?	commencers recognisions recognisions		ADDLESS OF THE STATE OF THE STA
(0)	Pre	-shipment Accumulation:	•	•	
	Marcoll St.	Are containers marked with start of accumulation date?			
	#1 12 45 ₩9	Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	· ,		

	Are wastes stored in containers wanaged in accordance with 40 GFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line?					
A. Tr	If wastes are stored in tanks, are the tanks managed according to the following requirements:	ri e massum tima	Himilanda sanda :	The section of the se		id-asses
	a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	Notice and an activity	77 SWANINGIA	SETTINUMBERTA CO.		
	b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	\$7*\$\sqrt{\sq}}}}}}}}}}\sintinitien\sintinn{\sqrt{\sq}}}}}}}}}}}}}\endittinnite}\signtiftity}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}}	, , , , , , , , , , , , , , , , , , ,	ASSET) ANGRESING		
	c. Do continuous feed systems have a waste-feed cutoff?	No Professor (Alexande)	o marchas assessas.	- norder og vægnende ætte.		A Decision
	d. Are required daily and weekly inspections done?	Sales are spendar	e Assemble control	grouphropolytes.	the state of the s	
	e. Are reactive and ignitable wastes in tanks protected from Sources of reaction and ignition, or rencered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.	Application of the state of the	har share from	ground of Eccusion	Lyntable or love land lanctive	<u></u>
	f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	and the control of th	W 458640Linky	co. Jh Gall Physiol y m		
	g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reaction wastes?	haltsvijam/dejsjam/d	10-stransita were	nonaton:		-mit

include: (i	Tank diameter? Distance of tank from (see tables 2-1 throughout the Code - 1	props gh 2-6 1977" t	rty 1 of N o det	ine? _ EPA's ermine	"Flammable and
include: (i	(see tables 2-1 throu Combustible Code - l	igh 2-6 1977" t	of N o det	EPA's ermine	"Flanmable and
include: (i	Combustible Code - 1	ergenc	o det	ernine	"Flammable and compliance)
include: (i	State of the state		odensionikkommini	Jan Bree Street Street St. To	25
include: (i		YES		A A	
	1 training racords Effective 5/19/81)			÷	
	les?	en e	egent ev cambia ble	PONAMENTAL TOPPS	entralist () Allo Liu stimmutten 1 il maggemente di tresco o mang di materio Caragamente di salari Statistica (appropriate deservici a le restatistica (a
2. Job Des	criptions	South despends to	grant Gent	W-schooleng	A CONTROL OF THE PROPERTY OF T
3. Descrip	tion of training?	group that make the) necodition (1) to	·m·ako dándelo	and the second s
4. Records	of training?	Specifically after a great	ranado adelitato ato	us-seepladdesteen 24	A_{ij} where A_{ij} is the state of the
receive	cility personnel d required train- 5-19-81	sourreignes (fair	energia de la constanta de la	COMMINGEN	
6. Do new require six mor	personnel received d training within ths	ернұ мурт актей); я	rsering attil	dinasensa	
Prepardness (Part 259	and Prevention 5, Subpart C)		•		
1. Mainter of Faci	nance and Operation				
ex; he:	there any evidence of fire plosion, or release of zardous waste or hazardous ste constituent?	The second secon	1		•

Record the following information:

4. 4.		required, does this facility at the following equipment:	endergraften kinnerfe er.	drawing patronists \$144.00	Norman VI	по инивысийня дин не принципальным мустум типую выше вы эти и из правод на принципальный правительный и наприлительный мустум принципальный на принципальный наприлительный наприлительный на принципальный наприлительный наприлительн
	7. 2.4 s	Internal communications or alarm systems?	Same and	epoperatura karakan da	gen gow (1−200)	and in the continued of
	Ď.	Telephone or 2-way Radios at the scene of operations?	Autor-deriving transport	fnámri kvadber vstír dejsukhly	Authorn (I-Cod)	and the second s
	in the state of th	Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	unheten seun	- www.paga-paga-	e distraction de la company	Challenger in the independence of contract in part of particular and particular a
	Ind	icate the volume of water and/or	foam a	nvailabl	e fo	r fire control
		La Commence and a second and a second and a second and a second as	A de la companya del companya de la companya del companya de la co	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	ne vanorancoh	the state of the s
	14milli-himbali	the second secon	unanticipa ranglemma ditrens use e	The second of th	alasta ya menenga berenj	######################################
डं. वर्ष १५८ क		ting and Maintenance of organicy Equipment:	•			
	∌ *	Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment	egy or some	Qui MANGERONI BU BANG	· Namasa mah dib	and the state of t
	The state of the s	Is emergency equipment Maintained in Operable Condition?	an naharas	elementories on 6	enegyczy wszie	Commence of the second of the
A R	4	Owner/Operator provided mediate access to internal arms (if needed)?	with the frame	per scriptulation between	(१९८क ्ष नेप्राक्षेत्र	encentral cost characters on other the physical data was all allowance or reagainst an included and included an included and contract and an extension of the contrac
E, s	Is for	there adequate aisle space unobstructed movement?	-	SHOCK (DEWLEPHING) (M.	e-kadetaanine	Any public submitties submittee to the contraction of the contraction
Cor		ency Plan and Emergency Procedum (Part 265, Subpart D)	"C	<u> </u>		HOT BELEVOLLO FORMAN

		Are copies of the Contingency Plan available at site and location Emergency Organizations?	", " November 1994 - Standard				
	est,	Emergency Coordinator					
		a. Is the Facility Emergency Coordinator Identified?	challentishade () enderstimate () hazast markti.	Land to the second of the seco			
		b. Is coordinator famaliar with all aspects of site operation and emergency procedures?	-Proprietors - Andriadores - Land & Carling	de Chin de Joseph Henri Montanie de Halland de Control 1860 de Selectión de Septembra de Lagrado de Responsación de Lagrado de Lagra			
		c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan					
	4. [mergency					
	Ĉ	f an emergency situation has coured at this facility; has he emergency coordinator followed he emergency procdures. listed in 265.56?	The administration of				
VI. RECORDKEEPING AND REPORTING (Part 262, Subpart D)							
	Exc Res	Manifests, Annual Reports, eption Reports, and All Test wits and Analyses Retained for least three years?	acitroserve geometricus essentistis				
(3)	735	the Generator submitted Annual	,				
		orts and Exception Reports as wired?	STORTIGETUS AVERTANNIA (PROSETURA)	and the second s			
VII. INTERNATIONAL SHIPMENTS (Part 202 Subpart E)							
	las Exp	the Installation Imported or orted Hazardous Waste?	estructurates estructuras estructuras	പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ പ്രത്യാര്യ			

VIII. Romanks

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FALED POWER

August 31, 1981

Director Region V EPA P. O. Box 7861 Chicago, IL 60680

Dear Sir:

Re: Interim Status Compliance for Hazardous Waste Facilities

During August of 1980, Part A (Hazardous Waste Facility Applications) were submitted for five Sealed Power manufacturing facilities. At that time, the regulations being adopted by the EPA seemed to indicate that each of these plants may ultimately be regulated as a hazardous waste treatment facility. Since this possibility did exist and since the penalty for not filing a Part A by the required date could have been curtailment of our manufacturing operations, we felt that it was good insurance to submit these Part A's. Later we could determine their true applicability as the additional rules were put in place and as the way in which the rules would be interpreted became more clear.

Since that date, we have monitored the continuing application of the RCRA rules and have closely studied how these rules affect our manufacturing facilities. It is now our opinion that none of these five facilities is, in fact, a hazardous waste treatment, storage, or disposal facility, and we request that they be removed from the system. Each of these facilities along with the rest of our manufacturing plants will continue to be involved with the RCRA rules as hazardous waste cenerators, and we feel they will be adequately regulated as such. In addition to RCRA rules, each of these facilities operates under and is regulated by NPDES programs, air quality permits, industrial pretreatment standards, State, County, and City discharge ordinances, and Michigan Act 64 Rules.

By this letter we wish to cancel the Part A applications for the five facilities listed below:

Plant	I.D. #	
Sanford Street	MIT270010580	(MID006024129)
My-Lift #1	MID060174125	T.
Harvey Street	MID043682327	
Dowariac	MID078920121	
St. Johns	MTD005515614	

Director - Region V EPA August 31, 1981 Page 2

If any additional information is required or if there is a formal process that we should use, please contact me and we will provide whatever assistance is needed.

Sincerely,

SEALED POWER CORPORATION

Caniel T. Girvan Environmental Engineer

mtn

ig St.